

Exhibit F

Jared Goodman

From: Victor Essen <vessen@rssclaw.com>
Sent: Thursday, September 5, 2019 11:05 AM
To: Jared Goodman
Cc: Debbie Champion; James P. Martin - Polsinelli (jmartin@polsinelli.com); Kelly Muensterman; Martina Bernstein
Subject: RE: MPF v. PETA: Mediation

Mr. Goodman:

I do not believe that mediation is going to be feasible at this point in this case. Obviously, mediation will necessarily involve additional costs to my client that she simply cannot bear.

In addition, I do not believe that it will make much sense to conduct any significant discovery at this point. Based on our latest conversations with our client, we intend to move forward on a motion to dismiss this case as moot. We should be able to file that relatively soon, and I think we can then proceed from there.

Victor H. Essen, II
Rynearson, Suess, Schnurbusch
& Champion, L.L.C.
500 N. Broadway, Suite 1550
St. Louis, MO 63102
(314) 421-4430
FAX: (314) 421-4431

NOTE: The Missouri Bar Disciplinary Counsel requires all Missouri lawyers to notify all recipients of e-mail that (1) e-mail communications is not a secure method of communication, (2) any e-mail that is sent to you or by you may be copied and held by various computers it passes through as it goes from sender to recipient, (3) persons not participating in our communication may intercept our communications by improperly accessing your computer or my computer or even some computer unconnected to either of us which the e-mail passes through. I am communicating to you via e-mail because you have consented to receive communications via this medium. If you change your mind and want future communications to be sent in a different fashion, please advise me AT ONCE.

From: Jared Goodman [mailto:JaredG@PetaF.org]
Sent: Wednesday, September 04, 2019 12:42 PM
To: Victor Essen
Cc: Debbie Champion; James P. Martin - Polsinelli (jmartin@polsinelli.com); Kelly Muensterman; Martina Bernstein
Subject: [EXTERNAL] RE: MPF v. PETA: Mediation
Importance: High

Victor,

I am following up for your client's position on mediation, and Martina's inquiries with respect to, among other apparently outstanding discovery, Casey and MPF deposition dates and an updated privilege log. To conduct those depositions in a timely manner and provide your client with sufficient notice, please provide your availability and confirmation that you would like those held at your office by the end of the week.

Jared

Jared Goodman
Deputy General Counsel for Animal Law
PETA Foundation

2154 W. Sunset Blvd.
Los Angeles, CA 90026
T: (323) 210-2266
F: (213) 484-1648
M: (516) 319-5906

This message may be protected by the attorney-client privilege and/or the attorney work product doctrine. If you believe you have received this message in error, please reply to the sender that it has been sent in error and delete the message. Thank you.

From: Victor Essen <vessen@rssclaw.com>
Sent: Friday, August 23, 2019 1:07 PM
To: Jared Goodman <JaredG@PetaF.org>
Cc: Debbie Champion <dchampion@rssclaw.com>; James P. Martin - Polsinelli (jmartin@polsinelli.com) <jmartin@polsinelli.com>; Kelly Muensterman <KMuensterman@Polsinelli.com>; Martina Bernstein <MartinaB@petaf.org>
Subject: RE: MPF v. PETA: Mediation

Jared:

I intend to have a chat with my client next week. I will discuss this along with the matters raised in the other e-mails from your end of things. I will follow up with you all after that chat.

Thanks,
Vic

Victor H. Essen, II
Rynearson, Suess, Schnurbusch
& Champion, L.L.C.
500 N. Broadway, Suite 1550
St. Louis, MO 63102
(314) 421-4430
FAX: (314) 421-4431

NOTE: The Missouri Bar Disciplinary Counsel requires all Missouri lawyers to notify all recipients of e-mail that (1) e-mail communications is not a secure method of communication, (2) any e-mail that is sent to you or by you may be copied and held by various computers it passes through as it goes from sender to recipient, (3) persons not participating in our communication may intercept our communications by improperly accessing your computer or my computer or even some computer unconnected to either of us which the e-mail passes through. I am communicating to you via e-mail because you have consented to receive communications via this medium. If you change your mind and want future communications to be sent in a different fashion, please advise me AT ONCE.

From: Jared Goodman [<mailto:JaredG@PetaF.org>]
Sent: Thursday, August 22, 2019 3:09 PM
To: Victor Essen
Cc: Debbie Champion; James P. Martin - Polsinelli (jmartin@polsinelli.com); Kelly Muensterman; Martina Bernstein
Subject: [EXTERNAL] MPF v. PETA: Mediation

Victor,

While Judge Perry is no longer ordering mediation, Plaintiffs are still amenable to in-person mediation consistent with the court's directive to continue to attempt to resolve this matter by settlement. Given the purported ownership status of the chimpanzees, however, we would require that Ms. Haddix voluntarily participate in the mediation as well.

Please advise as to whether Mss. Casey and Haddix are willing participate in mediation and, if so, provide availability to do so during the month of September. I'd appreciate your response by early next week to allow for sufficient time to agree to a mediator and find an acceptable date.

Thank you.

Jared

Jared Goodman
Deputy General Counsel for Animal Law
PETA Foundation
2154 W. Sunset Blvd.
Los Angeles, CA 90026
T: (323) 210-2266
F: (213) 484-1648
M: (516) 319-5906

This message may be protected by the attorney-client privilege and/or the attorney work product doctrine. If you believe you have received this message in error, please reply to the sender that it has been sent in error and delete the message. Thank you.